

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC ,
et al

Plaintiffs,

v.

C A No, 04-1337-KAJ

AUDIOVOX COMMUNICATIONS CORP ,
et al

Defendants

HONEYWELL INTERNATIONAL INC ,
et al.

Plaintiffs,

v.

C A No. 04-1338-KAJ

APPLE COMPUTER, INC , et al

Defendants

DECLARATION OF MITCHELL MARKOW

1. I am an employee of Dell Inc ("Dell"), and I submit this Declaration on behalf of Dell in support of the pure customer defendants' Motion to Stay the above-entitled actions.

2. I have been continuously employed by Dell since August 2000 and have held a variety of positions directly involved with Dell's product development business. Among the positions I have held at Dell, I have served as Senior Manager Audio Development Group, Senior Manager Flat Panel Displays Group and Acting Director of Flat Panel and Television Development. By virtue of these positions and in my current

role as Senior Manager Performance Notebook Engineering, I am familiar with Dell's products containing Liquid Crystal Display ("LCD") panels

3. Dell is in the business of, among other things, the sale of televisions, computer monitors, laptop computers, personal digital assistants, digital still cameras and digital video recorders which contain an LCD panel

4. Dell does not, nor has it ever, designed or manufactured any LCD panels which are part of any Dell product. Rather, Dell purchases all LCD panels used in Dell products from third party suppliers and manufacturers

5. Pursuant to Section 1746 of Title 28 of the United States Code, I declare the foregoing to be true and correct under the penalties of perjury of the United States of America.

Dated: May 5, 2005

A handwritten signature in black ink, appearing to read 'M. Markow', is positioned above the printed name.

Mitchell Markow

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2005, I hand delivered the foregoing document to the following persons and electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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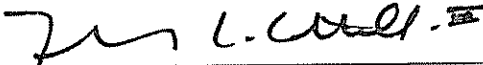
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